

ADW
F. # 2020R00682

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

— — — — — X

UNITED STATES OF AMERICA

BILL OF PARTICULARS

— against —

Criminal Docket No. 22-0245 (CBA)

EDISON HERNANDEZ,
also known as “dragoncove,”
“originaldragoncove,”
“theoriginaldragoncove” and
“Nino,”

MICHAEL CARUSO and
RAYMER YNOA,

Defendants

— — — — — X

The United States of America, by and through BREON PEACE, United States Attorney, for the Eastern District of New York, and Andrew D. Wang, Assistant United States Attorney, hereby files the following Bill of Particulars for Forfeiture of Property.

The above-captioned Indictment seeks forfeiture of property pursuant to 21 U.S.C. § 853(a). The United States hereby gives notice that, in addition to the property described in the forfeiture allegations in the above-captioned Indictment, the United States seeks forfeiture of all right, title and interest in:

- (i) the real property and premise known as 1213 Myrtle Ave, Brooklyn, New York 11216, and all proceeds traceable thereto;
- (ii) the real property and premise known as 227A Cooper Street, Brooklyn, New York 11207, and all proceeds traceable thereto;

- (iii) the real property and premise known as 229 Cooper Street, Brooklyn, New York 11207, and all proceeds traceable thereto;
- (iv) the real property and premise known as 805 Chestnut Street, Utica, New York 13502, and all proceeds traceable thereto;
- (v) the real property and premise known as 1517 Sunset Ave, Utica, New York 13502, and all proceeds traceable thereto; and
- (vi) the real property and premise known as 1630 St. Agnes Ave, Utica, New York 13501, and all proceeds traceable thereto;

pursuant to 21 U.S.C. § 853(a), as: (a) property constituting, or derived from, any proceeds obtained directly or indirectly as the result of violations of 21 U.S.C. §§ 841 and 846; and (b) property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offenses. The United States reserves the right to supplement or amend this Bill of Particulars.

Dated: Brooklyn, New York
July 13, 2022

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/
Andrew Wang
Assistant United States Attorney
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